REMEDIAL SITE ASSESSMENT DECISION - EPA REGION V

Page 1 of 1

EPA ID: ILD980902134

Site Name: PHILLIPS THOM LANDFILL

State ID:

Alias Site Names: PHILLIPS THOM LDFL

City:

MONTGOMERY

Refer to Report Dated: 9/22/2009

County or Parish: KANE

State: IL

Report Developed By: STATE

Report Type: OTHER CLEANUP ACTIVITY 001

1. Further Remedial Site Assessment Under CERCLA (Superfund) is not required because:

NFRAP-Site does not qualify for the NPL based on existing information

2. Further Assessment Needed Under CERCLA:

Discussion/Rationale:

The U.S. Environmental Protection Agency (EPA) has determined that no further remedial action by the Federal Superfund program is warranted at the referenced site, at this time. The basis for the no further remedial action planned (NFRAP) determination is provided in the attached document. A NFRAP designation means that no additional remedial steps under the Federal Superfund program will be taken at the site unless new information warranting further Superfund consideration or conditions not previously known to EPA regarding the site are disclosed. In accordance with EPA's decision regarding the tracking of NFRAP sites, the referenced site may be removed from the CERCLIS database and placed in a separate archival database as a historical record if no further Superfund interest is warranted. Archived sites may be returned to the CERCLIS site inventory if new information necessitating further Superfund consideration is discovered.



Site Decision Made by: ERICA ISLAS, SAM

Signature:

Date: 09/22/2009

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY



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ROD R. BLAGOJEVICH, GOVERNOR

DOUGLAS P. SCOTT, DIRECTOR

January 7, 2009

Ms. Laura Ripley
Early Action Coordinator
Office of Superfund
Region 5 Offices
U.S. Environmental Protection Agency
77 West Jackson
Chicago, Illinois 60604

Ms: Ripley:

Please find enclosed copies of Site Reassessment Report and QUICKSCORE worksheets for the following sites that were scheduled for Fiscal 2008 completion.

SITE NAME ILD NUMBER COUNTY RECOMMENDATION

Phillips, Thom LF 980902134 Kane NFA

We are pleased to provide you with the attached reports. Should you have any questions or comments concerning this submission please feel free to contact me, or the author of the specific report.

Sincerely,

Thomas Crause

Manager, Office of Site Evaluation

Division of Remediation Management

Bureau of Land



SITE REASSESMENT For

Phillips Thom Landfill Montgomery, Illinois ILD 980902134 LPC 0894695045 October 2008

ILLINOIS ENVIRONMETAL PROTECTION AGENCY OFFICE OF SITE EVALUATION

Regional EPA Approval. Erica Islas, SAM Enca Osen 9/22/09

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SITE REASSESSMENT

Section 1.0 Introduction

On April 11, 2007, the Illinois Environmental Protection Agency's (Illinois EPA)

Office of Site Evaluation was tasked by the Region V Offices of United

Environmental Protection Agency (U.S. EPA) to conduct a Site Reassessment at the Phillips Thom Landfill located in Montgomery, Kane County, Illinois.

Current U.S. EPA policy stipulates that a Site Reassessment be conducted to determine the current status of Phillips Thom Landfill. This Site Reassessment will consist of an evaluation of recent information to determine if further Superfund investigation is warranted. The reassessment will supplement previous assessment work, and is not intended to replace previous CERCLA assessments.

The Site Reassessment is designed to provide necessary information that will help determine if the site qualifies for possible inclusion on the National Priorities List, or should receive a No Further Remedial Action Planned (NFRAP) designation. At the end of the reassessment process the author will recommend that the site be given a NFRAP designation, receive further Superfund investigation, or referred to another state or federal cleanup program. The Site Reassessment is performed under the authority of the Comprehensive Environmental Response,

Compensation and Liability Act (CERCLA) commonly known as Superfund.

The Phillips Thom Landfill was placed on the Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) in 1984. In that same year the Illinois EPA conducted a Preliminary Assessment (PA) and the site was designated as a low priority. This activity was followed by a Site Inspection (SI) conducted by a U.S. EPA contractor and the site was designated as a high priority. In November of 1996, Illinois EPA conducted an Expanded Site Inspection (ESI). At the conclusion of this activity, the site was recommended for Hazard Ranking System (HRS) scoring. Following this recommendation the owners of the site entered into the Illinois EPA's Site Remediation Program. Site Reassessment Report will evaluate current site conditions and illustrate how the site has changed since the initial CERCLA investigation. This report will contain a review of existing information to determine site history, current site conditions, and evaluate analytical data that may exist on the site. The Site Reassessment will also support emergency response or time-critical removal activities if it is determined that they are warranted.

Section 2.0 Site Description and History

2.1 Site Description

The landfill is located south of the Illinois Route 30 bypass and west of Albright road in Montgomery, Kane County, Illinois (see Figure 1 and 2). Bordering the site to the south are residences, to the west and north farm fields, and to the east commercial properties. Further out to the south and west are more residential and industrial areas. The city of Aurora is located two miles northeast of the site and the Fox River

is a half mile to the east. The site coordinates are latitude 41.725° north, longitude 88.356° west.

In 1996, the site was inactive and occupied a 22 acre area (see Figure 3). Today Bohr Avenue divides the site into two sections. Bohr Avenue appears to be part of a planned commercial development that will encompass the entire disposal area. Two truck depot facilities are currently located in this area. According to the ESI, the northern section had exposed waste materials and was poorly vegetated. The southern section was essentially void of any vegetation and had a loose sand and gravel surface. No final cover material was noted on either section.

According to the 1996, CERCLA Site Inspection, groundwater flow is to the north, northeast and is approximately 45 feet below grounds surface (bgs). Local wells range in depth from 20 to 70 feet bgs and the community wells are located greater than one mile from site and range in depth from 500-2000 feet bgs.

2.2 Operational History

Site originated as a gravel quarry sometime in 1957, on two contiguous parcels of land. One referred to as the Phillips parcel and the other as the Thom parcel. Excavation of the gravel deposit began on the 4.75 acre Thom parcel in 1957. It was excavated down to a clay layer at an approximate depth of eight to ten feet bgs. The excavation then moved onto the larger 17.25-acre Phillips parcel but only 9.25 acres of it were part of the quarry operations. Again this excavation was to the same level as the original Thom excavation. Sometime in 1963, the excavating ended and the landfill operations began, beginning with the Thom Property and later the Phillips Property.

Originally these operations were permitted by the county under a County Landfill Permit issued in 1959. Later a state development permit was issued by the Illinois Environmental Protection Agency (IEPA) in 1975, after complaints were filed with the Illinois Pollution Control Board (IPCB) in 1974. Operations at the site continued until 1976, when more complaints were filed with the IPCB regarding violations of the Illinois Environmental Protection Act and Chapter 7 of the IPCB Rules and Regulations on Solid Wastes. Orders issued by the IPCB at this time resulted in the cessation of operations and the covering of the site with 30 inches of clay. File information does not indicate if the 30 inch clay cover requirement had been complied with.

In 1976 seven groundwater monitoring wells were installed on-site and three more at a later date. According to a 1986 Ecology and Environment report groundwater samples taken in 1980 revealed on-site PCB concentrations of 25 parts per million (ppm) and off-site levels at 0.12 ppm.

2.3 CERCLA Investigative History

CERCLA activities began for the site in 1984, with the site being placed on the CERCLIS. In that same year the Illinois EPA conducted a Preliminary Assessment of the site. Base on the findings of that assessment a Site Inspection was conducted for U.S. EPA by Ecology and Environment Incorporated in 1987. In 1996, this was followed by an Illinois EPA lead Expanded Site Inspection.

The 1987, Site Screening Inspection found the monitoring wells blocked by unknown obstructions and this resulted in no groundwater samples being collected. Based on groundwater sampling data from 1980 the site was designated as a high priority and advanced to the next stage of the CERCLA process.

During the 1996, ESI Inspection several volatile and semivolatile organic and inorganic substances were detected at numerous on-site sample locations. On-site groundwater samples had elevated levels of: chloroethane, acetone, 2-butanone, benzene, toluene, ethylbenzene, xylene, arsenic, lead, and cyanide. MCLs (Maximum Contaminant Levels) were exceeded for benzene which was detected at 51 parts per billion (ppb) (5 ppb MCL), ethylbenzene 4,300 ppb (700 ppb MCL), xylene 18,600 ppb (10,000 ppb MCL), and lead 35 ppb (15 ppb MCL). RALs (Removal Action Levels) were also exceeded for ethylbenzene 4,300 ppb (1,000 ppb RAL), and naphthalene 410 ppb (100 ppb RAL).

The RALs comparision values came from a U.S.EPA, Hazard Evaluation Handbook, A Guilde to Removal Actions.

On-site soil samples had levels three times background for: trichloroethene, 4-methylphenol, naphthalene, 4-chloraniline, 2-methylnaphthalene, phenanthrene, fluoranthene, pyrene, butylbenzyphthalate, di-n-octylphthalate, arsenic, barium, beryllium, cadmium, chromium, cobalt, copper, lead, magnesium, mercury, nickel, selenium, thallium, zinc, and cyanide. RALs were exceeded for, arsenic which was detected at 87 ppm (8 ppm RAL), chromium 510 ppm (200 ppm RAL), cyanide 37.4 ppm (12 ppm RAL), and total Polynuclear Aromatic Hydrocarbons (PAHs) 1430 ppm (500 ppm RAL).

Off-site sampling consisted of the collection of several residential drinking water samples from private wells adjacent to and down gradient of the site. One private well that borders the site to the south had elevated levels of lead at 307 ppb (15 ppb MCL), and manganese at 185 ppb (150 ppb MCL).

Section 3.0 Other Cleanup Authority Activities

Base on the findings of the ESI, in May of 1996, owners of the site entered into the Illinois EPA's Site Remediation Program in January of 1997. After reviewing the site information the Illinois EPA, had three requirements to be met before a No Further Remedial Action Planned letter could be issued:

- 1. The site owner was required to have the private wells surrounding the site connected to the city water supply.
- 2. The site owner was required to install four monitoring wells at the site and record the geologic information from these wells.
- 3. The site owner was to minimize leachate development by paving the site with the proposed industrial park and concrete/asphalt parking lots.

The site has never complied with these requirements and has not been issued a No Further Remedial Action Planned letter for the closure of the landfill.

Due to the lack of progress regarding these requirements the site was referred to the Illinois EPA's Enforcement Decision Group (EDG) in July of 2001. This resulted in additional residential water samples being collected by the Illinois EPA's Field Operation Section (FOS). This inspection occurred in May of 2002, and included the collection of six residential well samples. The samples were analyzed for the full Target Compound List (TCL). None of the samples collected reported any levels above an MCL.

The author of this CERCLA Site Reassessment report conducted a site visit in December of 2007. The purpose of this visit was to assess the current conditions at the site. Photographs taken during the site visit are contained in Attachment A of this report. From these photographs it is apparent that the owner continued with the commercial development of the property.

The majority of the areas that had once contained exposed landfill material are now covered by buildings, parking areas, or roadways. The northwest corner of the property was the area most heavily covered with industrial waste. Now that area is completely covered with a mixture of self storage buildings and asphalt pavement. The southern portion of the property was minimally impacted by past site activities. At the time of the site visit, it appeared to be re-graded and landscaped with trees. The remainder of the site had several new buildings and paved parking areas. The entire site appeared to be well contoured and well

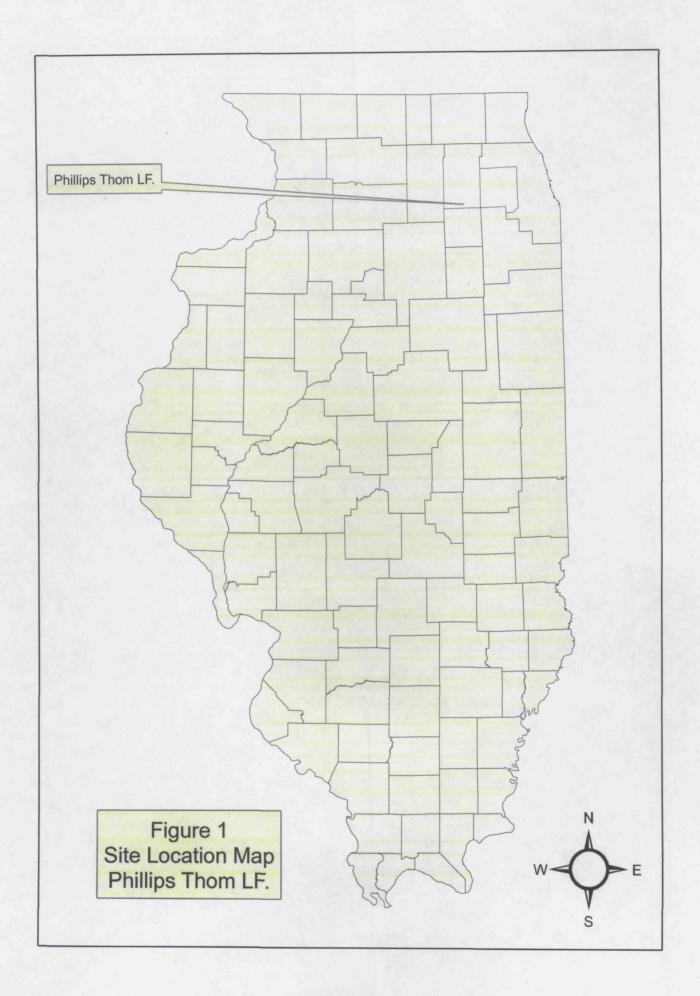
drained. There were no signs of erosion or ponding on at the site. The areas not covered by structures or pavement have plantings that indicated that they have been landscaped and would be vegetated with grass. It also appears that the northern area has been raised several feet; suggesting that additional cover material has been placed on this area. This would further limit people from being exposed to the surface waste.

The above mentioned activities have greatly reduced the sites threat to human health and the environment. The Soil Exposure Pathway and Air Migration Pathway have been eliminated by the physical barriers that the improvements to the site provide. These improvements also protect the waste material from water infiltration and erosion minimizing the threat to the Surface Water and Ground Water Pathways.

Section 4.0 Summary and Conclusions

Previous environmental investigations at this site document a release to groundwater on-site that included: Inorganic analytes, organic compounds and PCBs. The Expanded Site Inspection documented lead levels in a private well in excess of the MCL. Originally the owners of the site entered the site in the Illinois EPA's Site Remediation Program and began the process of obtaining a No Further Remedial Action Planned letter (NFRAP). The site owners failed to complete a majority of the requirements for the NFRAP letter. Minimizing leachate by paving the site with the proposed industrial park and concrete/asphalt parking lots was the only requirement possibly addressed at the site. The Illinois EPA has no additional

information on that project. The last investigation conducted by the Illinois EPA included the re-sampling of the residential wells closest to the landfill. None of these drinking water results were above an MCL. The results from this investigation are located in Attachment B.



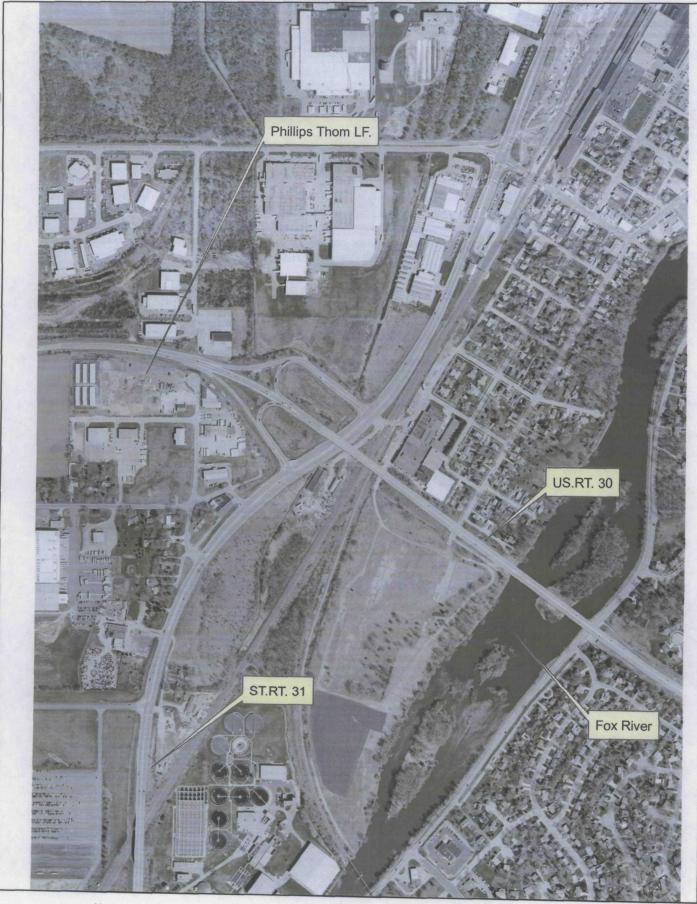




Figure 2
Site Area Map
Phillips Thom LF.

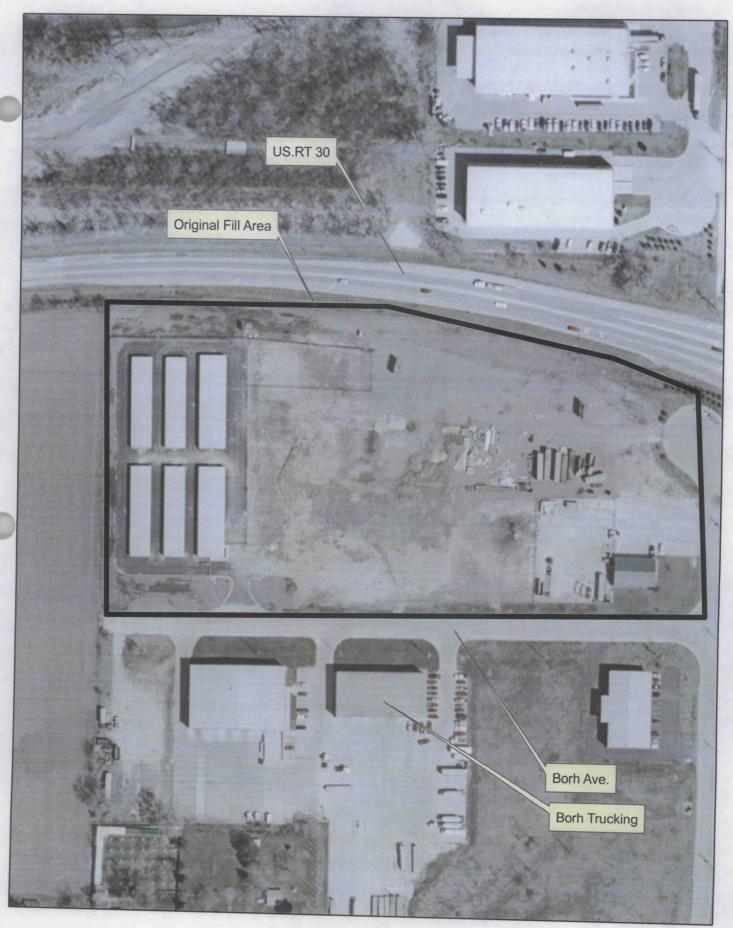




Figure 3
Site Features Map
Phillips Thom LF.

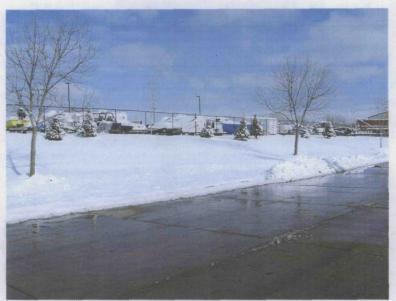
ATTACHMENT A



Southeast of original fill area.



Southwest of original fill area.



Northeast part of original fill area.



Central part of original fill area.



Buildings south of original fill area.



Central part of original fill area.





Building south of original fill area.



Northwest corner of original fill area.



Field southwest of original fill area.